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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION AMONG PARTIES
EXTENDING TIME TO FILE
SUBMISSIONS WITH RESPECT TO FEE
EXAMINER PROTOCOL**

Re: Dkt. No. 3950

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by and among Bruce Markell, as Court-appointed Fee Examiner (the “**Fee**
3 **Examiner**”) in the above-captioned cases, the Office of the United States Trustee (the “**U.S.**
4 **Trustee**”), and the undersigned professionals (collectively, the “**Parties**,” and each, a “**Party**”).
5 The Parties hereby stipulate and agree as follows:

6 **RECITALS**

7 A. On September 19, 2019, the Fee Examiner filed the *Motion to Approve Fee*
8 *Procedures* [Dkt. No. 3950] (the “**Fee Examiner Protocol Motion**”), which the Court heard on
9 October 7, 2019 (the “**Hearing**”).

10 B. At the conclusion of the Hearing, the Court directed that the Parties meet and
11 confer with respect to the protocol proposed by the Fee Examiner (the “**Fee Examiner**
12 **Protocol**”), and that the following be filed by October 17, 2019 (collectively, the “**Further**
13 **Submissions**”):

- 14 a. A revised Fee Examiner Protocol based upon the Parties’ meet-and-
15 confer;
16 b. A response by the Fee Examiner to the oppositions filed to the Fee
17 Examiner Protocol; and
18 c. A statement from a senior officer of PG&E Corporation regarding his or
19 her position on the matters.

20 C. Based upon productive discussions held pursuant to the Court’s meet and confer
21 suggestion, the Parties are working towards amending the existing protocol to address all
22 objections made to date and have mutually agreed to extend the deadline for the filing of the
23 Further Submissions.

24 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
25 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
26 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
27 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
28 **THAT:**

1 1. The time for the Parties to file the Further Submissions is extended through October
2 24, 2019.

3 [*Signatures on Next Page*]
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1 Dated: October 17, 2019

2 KELLER & BENVENUTTI LLP

OFFICE OF THE UNITED STATES
TRUSTEE

3
4 /s/ Jane Kim

5 Jane Kim

6 *Attorneys for Debtors
and Debtors in Possession*

/s/ Jason Blumberg

Jason Blumberg

Trial Attorney
*Attorney for Andrew R. Vara,
Acting United States Trustee for Region 3¹*

7
8 BRUCE MARKELL

MILBANK LLP

9
10 /s/ Bruce Markell

11 Bruce Markell

12 *Court-Appointed Fee Examiner*

/s/ Thomas Kreller

Thomas Kreller

*Attorneys for the Official Committee of
Unsecured Creditors*

13
14 CRAVATH, SWAINE & MOORE LLP

BAKER & HOSTETLER LLP

15
16 /s/ Paul H. Zumbro

17 Paul H. Zumbro

18 *Attorneys for Debtors
and Debtors in Possession*

/s/ Elizabeth A. Green

Elizabeth A. Green

*Attorneys for the Official Committee of
Tort Claimants*

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27 ¹ Andrew R. Vara, Acting United States Trustee for Region 3, is acting in this appointment for Tracy Hope Davis,
United States Trustee for Region 17, who is recused from the above-captioned cases.